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March 20, 2023

**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Flores, et al. v. The National Football League, et al.*, No. 22-cv-871-VEC

Dear Judge Caproni:

Pursuant to Paragraph 2(C) of Your Honor's Individual Practices in Civil Cases, Defendants and Plaintiffs write jointly in the above-captioned matter to respectfully request an extension of the briefing deadlines for the parties' recently filed motions for partial reconsideration of the Court's March 1, 2023 order. *See* Dkts. 79, 81. Currently, Defendants' opposition to Plaintiffs' motion is due by March 28, 2023, and Plaintiffs' reply is due by April 4, 2023; Plaintiffs' opposition to Defendants' motion is due by March 29, 2023, and Defendants' reply is due by April 5, 2023. The parties respectfully ask that the deadlines for their respective oppositions to both motions be extended to April 7, 2023, and the deadlines for their respective replies to April 21, 2023, so that the parties may have adequate time to fully brief the issues raised in their respective motions. There have been no previous requests for extensions of these deadlines.

The parties also respectfully request an adjournment of the pretrial conference currently scheduled for April 7, 2023 at 10:00 a.m. and the March 30, 2023 deadline for the parties' pre-conference submissions. *See* Dkt. 78. The parties jointly seek this adjournment in light of their pending motions for partial reconsideration, which, under the current briefing schedule, would be fully briefed only two days before the currently scheduled pretrial conference (or two weeks thereafter, if the parties' request for an extended briefing schedule is granted). Given the potential impact that the Court's decisions on those motions could have on the issues to be addressed at the pretrial conference, including anticipated motions and the scope and schedule of discovery in this

case, the parties respectfully ask that the pretrial conference and attendant deadline for the pre-conference submissions be adjourned until after the Court has ruled on their motions. This is the parties' second request for an adjournment of these dates. *See* Dkt. 77.

Respectfully submitted,

/s/ Loretta E. Lynch  
Loretta E. Lynch

cc: Counsel of Record (via ECF)